



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

June 23, 2005

Mr. Bob Castaneda, Supervisor
Kootenai National Forest
1101 U.S. Highway 2 W.
Libby, Montana 59923

Re: CEQ 20050214; McSutten Project Final EIS
& ROD

Dear Mr. Castaneda:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the McSutten Project.

Thank you for providing responses to EPA's DEIS comments. As stated in our earlier DEIS comments, the EPA is supportive of the purpose and need of the McSutten Project to reduce wildfire risk, restore characteristic vegetation patterns, increase wildlife habitat, reduce aquatic impacts from roads and increase big game security while ensuring safe and economic access, and to respond to public social and economic needs. While we have concerns about potential erosion and soil and water quality impacts during timber harvests, we are pleased that less disturbing timber harvest methods and mitigation measures are proposed to reduce soil and water quality effects (e.g., skyline and helicopter logging, logging during winter on snow and frozen ground, restricting skidding with tracked machinery, ripping skid trails and landings to decompact soils, adding slash to ripped surfaces, placing woody debris, avoiding equipment operation on steep slopes exceeding 35%, use in INFS riparian/wetland buffers, etc.).

We are also pleased that 193 miles of road BMP improvements are proposed, with 5.6 miles of roads to be decommissioned and 4.7 miles of roads to be placed in storage and 1 mile of road realigned, to reduce road caused sediment production. There is a concern, however, that 97 miles of the proposed road BMP improvements, and a portion of the road decommissioning and storage work, would require less certain appropriated funds for implementation, and thus, this needed work may be less likely to be implemented on a timely basis. The EIS states that chronic sediment inputs to streams from roads would continue without appropriated funding to fix existing road problems, and that sediment from roads, particularly poorly maintained roads, is a major cause of adverse water quality impacts. Appropriated funding for road maintenance is often inadequate to address road maintenance needs. We believe roads should be maintained on a continuing basis to minimize sediment delivery, and if inadequate funds are available for road maintenance, we believe road decommissioning should occur to reduce the road network to that

which can be maintained within agency budgets and capabilities. The Forest Service should provide adequate funding to carry out needed road maintenance and road restoration to reduce chronic sediment delivery to streams.

The EPA appreciates the opportunity to review and comment during the NEPA process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov . Thank you for your consideration.

Sincerely,

/S/

John F. Wardell
Director
Montana Office

cc: Glen M. McNitt/Chris Fox, USFS Rexford Ranger District, Eureka
Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver

SUMMARY PARAGRAPH FORM

ERP NUMBER _____

RATING ASSIGNED TO PROJECT _____

EC-2 _____

**NAME OF EPA OFFICIAL RESPONSIBLE
FOR REVIEW OF PROJECT (Principle Reviewer)** _____

Steve Potts _____

SUMMARY OF COMMENT LETTER

_____ The EPA has reviewed the McSutten Project Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) prepared by the Kootenai National Forest. The EPA supported the project purpose and need, and was pleased that road maintenance road BMP upgrades and road decommissioning and road storage were proposed, but expressed concerns about potential water quality impacts, and availability of appropriated funds needed to carry out some of the needed road maintenance, road BMP installation and road decommissioning work to mitigate water quality impacts.

PARAGRAPH APPROVED FOR PUBLICATION _____ **(Initials of
OFA Approving Official)**

NOTE: Transmit 2 copies to MIU

8MO File: 0404